

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA - ATLANTA DIVISION

IN RE:

Angela Kay Jones,
AKA Angela Jones; AKA Angela K Jones,
Debtor.

* CASE NO. 25-52446-bem
*
* CHAPTER 13
*
* CONTESTED MATTER

MOTION TO EXTEND 11 U.S.C. § 362(a) STAY

COMES NOW Debtor and through counsel files this *Motion to Extend 11 U.S.C. § 362(a) Stay*, showing to this Honorable Court the following:

1.

This Court has jurisdiction in this contested matter pursuant to 28 U.S.C. § 1334; LR 83.7A NDGA; and, the Order of Referral entered by the United States District Court Northern District of Georgia on July 12, 1984. Venue is appropriate pursuant to 28 U.S.C. § 1409. This matter is a core proceeding as defined by 28 U.S.C. § 157(b)(2)(A)(G) and (O); in the alternative, Debtors expressly consent to this Court's entering an order in this contested matter. This motion is brought pursuant to 11 U.S.C. § 362(c)(3)(B) and F. R. Bankr. P. 9014.

2.

Debtor filed for relief in the instant Chapter 13 case on March 5, 2025.

3.

Debtor was the debtor in a prior bankruptcy case, case #24-61326, which was pending and dismissed within the twelve-month period preceding the filing of the instant case.

4.

Debtor's prior case was dismissed because of failure to make plan payments. In the prior case, Debtor attempted to work out payment arrangements for the rent but was not successful and

had to start the moving process. Also, Debtor has a medical issue in the prior case, and she was out of work for a period of time.

5.

Debtor avers that Debtor can successfully prosecute this case because Debtor has a new lease and is back to work.

WHEREFORE, Debtor prays that the stay under 11 U.S.C. § 362(a) be extended pursuant to 11 U.S.C. §362(c)(3)(B) as to all creditors in this case.

Respectfully submitted,

/s/
Thomas Reichard, GA Bar No. 150822
Attorney for Debtor

Clark & Washington, PC
3300 Northeast Expressway
Building 3
Atlanta GA 30341
Phone: 404-522-2222
Fax: 770-220-0685
Email: ecfnotices@cw13.com

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NOTICE OF HEARING ON MOTION TO EXTEND STAY

PLEASE TAKE NOTICE that Angela Kay Jones filed a *Motion to Extend 11 U.S.C. § 362(a) Stay* and related papers with the Court seeking an order to extend the Automatic Stay as to all creditors in this case.

PLEASE TAKE FURTHER NOTICE that the Court will hold a hearing on the Motion at **10:30 A.M. on March 19, 2025**, in Courtroom **1402**, United States Courthouse, **75 Ted Turner Drive, SW, Atlanta, Georgia 30303**, which may be attended in person or via the Court's Virtual Hearing Room. You may join the Virtual Hearing Room through the "Dial-in and Virtual Bankruptcy Hearing Information" link at the top of the homepage of the Court's website, www.ganb.uscourts.gov, or the link on the judge's webpage, which can also be found on the Court's website. Please also review the "Hearing Information" tab on the judge's webpage for further information about the hearing. You should be prepared to appear at the hearing via video, but you may leave your camera in the off position until the Court instructs otherwise. Unrepresented persons who do not have video capability may use the telephone dial-in information on the judge's webpage.

Your rights may be affected by the Court's ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.) If you do not want the Court to grant the relief sought in these pleadings or if you want the Court to consider your views, then you and/or your attorney must attend the hearing. You may also file a written response to the pleadings with the Clerk at the address stated below, but you are not required to do so. If you file a written response, you must attach a certificate stating when, how and on whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk before the hearing. The address of the Clerk's Office is Clerk, U. S. Bankruptcy Court,

Suite 1340, 75 Ted Turner Drive, Atlanta Georgia 30303. You must also mail a copy of your response to the undersigned at the address stated below.

Respectfully submitted
CLARK & WASHINGTON, PC

/s/
Thomas Reichard, GA Bar No. 150822
Attorney for Debtors

Clark & Washington, PC
3300 Northeast Expressway
Building 3
Atlanta GA 30341
Phone: 404-522-2222
Fax: 770-220-0685
Email: ecfnotices@cw13.com

CERTIFICATE OF SERVICE

I certify that on the 07 day of March 2025, I electronically filed the foregoing *Motion to Extend 11 U.S.C. § 362(a) Stay and Notice of Hearing* using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

K. Edward Safir, the Standing Chapter 13 Trustee

I further certify that on this day I caused a copy of this document to be served via the United States First Class Mail, with adequate postage prepaid or overnight mail on the following parties at the address shown for each.

Angela Jones
PO Box 92
Powder Springs, GA 30127

In addition, I certify that I served all creditors listed in the attached matrix by mailing copies of the motion and notice to the addresses indicated therein.

Dated: 03/07/2025

/s/
Thomas Reichard, GA Bar No. 150822
Attorney for Debtor
Clark & Washington, PC
3300 Northeast Expressway
Building 3
Atlanta GA 30341
Phone: 404-522-2222
Fax: 770-220-0685
Email: ecfnotices@cw13.com

Label Matrix for local noticing

113E-1

Case 25-52446-bem

Northern District of Georgia

Atlanta

Thu Mar 6 15:54:20 EST 2025

E. L. Clark
 Clark & Washington, LLC
 Bldg. 3
 3300 Northeast Expwy.
 Atlanta, GA 30341-3932

Bank of America

Attn: Bankruptcy

4909 Savarese Circle
 Tampa, FL 33634-2413

Capital One

Po Box 31293

Salt Lake City, UT 84131-0293

Current
 Attn: Bankruptcy
 217 Centre St #180,
 New York, NY 10013-3624

(p) COBB COUNTY MAGISTRATE COURT
 32 WADDELL STREET NORTHEAST
 BLDG D FLOOR 2
 MARIETTA GA 30090-2900

Credit Collection Services
 Attn: Bankruptcy
 725 Canton St
 Norwood, MA 02062-2679

(p) GWINNETT COUNTY CLERK OF COURT
 PO BOX 880
 LAWRENCEVILLE GA 30046-0880

Internal Revenue Service
 401 W. Peachtree St., NW
 Stop #334-D
 Room 400
 Atlanta, GA 30308

(p) GEORGIA DEPARTMENT OF REVENUE
 COMPLIANCE DIVISION
 ARCS BANKRUPTCY
 1800 CENTURY BLVD NE SUITE 9100
 ATLANTA GA 30345-3206

Lvnv Funding/Resurgent Capital
 Attn: Bankruptcy
 Po Box 10497
 Greenville, SC 29603-0497

Midland Credit Management
 PO Box 2037
 Warren, MI 48090-2037

Midland Credit Management Inc
 R.A. Midland Funding, LLC
 675 Ponce de Leon Ave, NE, Ste. 7500
 Atlanta, GA 30308-1884

(p) NATHAN & NATHAN P C
 ATTN JOHN NATHAN
 PO BOX 1715
 BIRMINGHAM AL 35201-1715

OneMain Financial Group LLC
 Reg. Agent: C T Corporation System
 289 S Culver Street
 Lawrenceville, GA 30046-4805

Progress Residential Borrower 4, LLC
 Reg. Agent: Corporation Service Company
 2 Sun Court
 Suite 400
 Peachtree Corners, GA 30092-2865

Purchasing Power, LLC
 Reg. Agent: C T Corporation System
 289 S Culver St
 Lawrenceville, GA 30046-4805

K. Edward Safir
 Standing Chapter 13 Trustee
 Suite 1600
 285 Peachtree Center Ave. NE
 Atlanta, GA 30303-1229

(p) SUNBIT INC
 ATTN LEGAL AND COMPLIANCE
 PO BOX 24010
 LOS ANGELES CA 90024-0010

(p) TRANSFORM CREDIT INC
 1440 W TAYLOR ST
 # 431
 CHICAGO IL 60607-4623

United States Attorney
 Northern District of Georgia
 75 Ted Turner Drive SW, Suite 600
 Atlanta GA 30303-3309

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Cobb County Magistrate Court
 32 Waddell Street
 Marietta, GA 30090

Georgia Department of Revenue
 Compliance Division
 ARCS Bankruptcy
 1800 Century BLVD NE Suite 9100
 Atlanta, GA 30345-3202

Gwinnett County Magistrate Court
 75 Langley Drive
 Lawrenceville, GA 30046

Nathan & Nathan P.C.

P.O.Box 1715

Birmingham, AL 35201

Attn: Bankruptcy

10940 Wilshire Blvd

Los Angeles, CA 90024

Attn: Bankruptcy

332 S Michigan Ave, 9th Floor

Chicago, IL 60604

End of Label Matrix

Mailable recipients	22
Bypassed recipients	0
Total	22